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Attorneys for Plaintiff
Gallagher-Kaiser Corporation

**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA**

GALLAGHER-KAISER CORPORATION, a
Michigan corporation,

Plaintiff,

vs.

LIBERTY DUCT, LLC, a Nevada limited
liability company; HARTFORD CASUALTY
INSURANCE COMPANY, an Indiana
insurance corporation; NGM INSURANCE
COMPANY, a Florida corporation; and DOES
1-10 Insurance Company(ies), inclusive,

Defendants.

CASE NO. : 2:14-cv-00869

**STIPULATION AND REQUEST FOR
ORDER EXTENDING BRIEFING
SCHEDULE TO DEFENDANT NGM
INSURANCE COMPANY'S MOTION
TO DISMISS FOURTH AMENDED
COMPLAINT**

(Second Request)

Plaintiff, GALLAGHER-KAISER CORPORATION ("GK"), by and through its attorneys
of record, the law firm of PEEL BRIMLEY LLP, and Defendant, NGM INSURANCE COMPANY
("NGM"), by and through its attorneys of record, the law firm of BARRETT & MATURA, P.C.,
hereby stipulate and agree as follows:

WHEREAS, GK filed its Fourth Amended Complaint on December 20, 2024 [Doc. 184]
("Fourth Amended Complaint");

WHEREAS, NGM filed its Motion to Dismiss Fourth Amended Complaint on January 17,
2024 [Doc. 188] ("Motion");

WHEREAS, the original deadline for GK to file its Response Brief ("Response") to the
Motion was Wednesday, January 31, 2024;

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1 **WHEREAS**, due to scheduling conflicts, GK initially requested and received from NGM's
2 counsel an additional two weeks to file its Response to the Motion, such that the Response would
3 have been due on Wednesday, February 14, 2024;

4 **WHEREAS**, since receiving the initial 2-week extension from NGM's counsel, GK's
5 counsel has encountered additional scheduling conflicts and has requested and received from
6 NGM's counsel one additional week to file the Response to the Motion, such that the Response is
7 now due on Wednesday, February 21, 2024;

8 **THEREFORE**, the parties agree and stipulate that GK shall have up to and including
9 Wednesday, February 21, 2024 to file its Response to the Motion.

10 **IT IS SO STIPULATED.**

11 Dated this 8th day of February, 2024.

12 **PEEL BRIMLEY LLP**

13 /s/ Cary Domina

14 _____
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22 Attorneys for Gallagher-Kaiser Corporation

12 **BARRETT | MATURA**

13 /s/ Jennifer Bahling

14 _____
15 KEVIN BARRETT, ESQ.
16 Nevada Bar No. 8959
17 7575 Vegas Drive, Suite 150c
18 Las Vegas, Nevada 89128
19 Direct: 602-792-5718
20 Fax: 602-792-5710
21 kbarrett@barrettmatura.com
22 Attorney for NGM Insurance Company

23 **IT IS SO ORDERED.**

24 _____
25 US District Court Judge

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From: [Jennifer Bahling](#)
To: [Cary Domina](#)
Cc: [Kevin Barrett](#); [Holly McGee](#); [Steve Meacham](#)
Subject: Re: Gallagher-Kaiser v. Liberty Duct - MTD Meet and Confer
Date: Friday, February 9, 2024 4:47:30 AM
Attachments: [image009.png](#)

Cary:

Looks good. You may sign and file.

Jennifer

Sent from my iPhone

On Feb 8, 2024, at 7:59 PM, Cary Domina <cdomina@peelbrimley.com> wrote:

Hi Jennifer:

Please let me know if you are okay with the attached SAO and authorize us to submit it to chambers with your electronic signature. Thanks.

Sincerely,

Cary B. Domina, Esq.
PARTNER

<[image001.jpg](#)>

<[image002.jpg](#)>

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